

EXHIBIT 1

This exhibit identifies enumerated instances of wire fraud in violation of 18 U.S.C. section 1343 by Defendants Hildebrandt, Franke, ConneXions, and Savage.¹

Hildebrandt and ConneXions

1. Instance 1: On the “Meet the Founder” page of ConneXions’ website (<https://www.connexionsclassroom.com/about-us>), Hildebrandt and ConneXions represented that Hildebrandt provides:

what is necessary to fully change, and champion any addictive or self-destructive behavior, whether it be ravenous addictions, feelings of worthlessness or inadequacy, conflicts in relationships, intimacy problems, communication breakdowns, and frankly any block that prevents having and creating peace and joy.

(Emphasis added). Hildebrandt and ConneXions have made this false representation on the ConneXions website since at least August 9, 2020. Upon information and belief, Defendants disabled this site on or around February 7, 2024. As fully set forth in the Complaint, the purpose and consequence of Hildebrandt’s and ConneXions’ false representations made on the ConneXions website were to induce individuals to purchase fraudulent services through ConneXions for the financial benefit of the Enterprise. The result of this instance of wire fraud is that, upon information and belief, the Enterprise victimized thousands of individuals.

2. Instance 2: Hildebrandt and ConneXions advertise the book “You are Not ‘Not Enough’” via the ConneXions Instagram page @connexionscoaching (<https://www.instagram.com/reel/CI6iVwxhJbh/>). On this page, Hildebrandt and ConneXions represent in a video posted on December 17, 2020:

I’ve watched thousands of people’s lives change as a result of them choosing using their agency to choose principles of Truth rather than distortion. Marriages have been salvaged; people have gotten out of addictions; depression has gone away from people’s lives; people with anxiety disorders, those have healed because they

¹ Capitalized terms have the same meanings as set forth in the Complaint and Jury Demand filed herewith.

start realizing that they have been using their agency to choose distortion rather than Truth. And so inside this book, it addresses all the principles of Truth.

This page and video remain active as of the date of this filing. The statements made in this video are false, and Hildebrandt and ConneXions knew them to be false at the time they were made because: (i) Hildebrandt and ConneXions' services actively destroy marriages in an effort to induce victims of the Enterprise to continue purchasing unnecessary, fraudulent services and products from ConneXions; and (ii) instead of assisting with addiction, Hildebrandt falsely diagnoses victims of the Enterprise addiction and other mental health conditions to coerce and induce individuals to purchase lengthy and costly twelve-step programs from ConneXions to financially benefit the Enterprise. As fully set forth in the Complaint, the purpose and consequence of Hildebrandt's and ConneXions' false representations made on the @connexionscoaching Instagram page were to induce individuals to purchase fraudulent services and/or products through ConneXions for the financial benefit of the Enterprise.

3. Instance 3: In the ConneXions podcast Episode 225, "*Fruits of Living in Truth*," released via Spotify and other platforms on June 2, 2023 (<https://open.spotify.com/episode/1VfV0RxH1104TpmunTqosC>), Hildebrandt and ConneXions represented that she has "cleaned [her] life up" and that she did not have anything in her life to regret or resent or anything similar:

So I would say that that is, that is the greatest, um, transformation for me is that I feel incredibly powerful. And when I say powerful I don't mean powerful to dominate another person. I feel empowered because I know how to hear the Truth, how to assess for Truth, how to reframe distortion back into Truth, how to stay outside of distortion -- I know how to do all of that. I know how to invite someone into Truth from distortion. I know how to not take anything that someone says or does personal [sic]. So I can move around the planet and I feel a lot of joy. And I, I feel calm and I, um, I've cleaned my life up and so I don't have things that are, that I'm dragging around that I regret or I resent or any of those kind of things and so it's really easy to just stay in the Truth.

Episode 225 was available until mid-2024 when Hildebrandt, Franke, and ConneXions removed the ConneXions podcasts from the internet. The statements made by Hildebrandt and ConneXions in this podcast episode are false and Hildebrandt and ConneXions knew them to be false at the time they were made because at the time Hildebrandt and ConneXions made these statements, Hildebrandt and Franke were physically torturing Victim 1 and Victim 2 and had not “cleaned [Hildebrandt’s] life up.” As fully set forth in the Complaint, the purpose and consequence of Hildebrandt’s and ConneXions’ false representations made on the ConneXions podcast were to induce individuals to purchase fraudulent services and/or products through ConneXions for the financial benefit of the Enterprise. Hildebrandt’s and ConneXions’ false representations made on Episode 225 also had the purpose and consequence of obscuring Hildebrandt’s past misconduct to attempt to induce individuals to become or remain affiliated with ConneXions and/or the Enterprise.

4. Instance 4: In the ConneXions podcast Episode 241, “*Holding Onto Trauma Will Make You Sick*,” released via Spotify and other platforms on August 11, 2023 (<https://open.spotify.com/episode/46g3dc0BWN7TRtNH0Y03qc>), Hildebrandt and ConneXions represented that Hildebrandt and ConneXions’ services and/or products will solve *any* mental health disorder and/or symptom. In the podcast episode, Hildebrandt answered a listener question regarding how to use “Truth” to address PTSD symptoms. Hildebrandt claims that the PTSD symptoms were caused by the listener being in “distortion”:

If you’re willing, now I don’t know that you’re willing, you may not be willing, you may just wanna, you know, write a question in and cause problems as far as like, “I can’t heal. I can’t change. See? Living in Truth doesn’t work.” Well, the Truth is, is that living in Truth always heals. Always. It’s not possible to truly use your mind, use your thoughts, and be responsible for your feelings, be responsible for your behaviors and not heal. You will heal. It’s as, it’s as absolute as cleaning out a, a wound on your body. You clean out the infection, you will heal.

‘Kay? So, what you’re telling me is that you have not gotten into the Truth, or maybe you don’t want to tell yourself the Truth. Maybe you have told yourself the Truth, but you really don’t want to stay in the Truth. Maybe you like being a victim, maybe you like the attention you get from being a victim. I, I don’t know what your particular case is.

But the question was, “If I have PTSD, and I keep getting triggered, is that a distorted fear?” And the answer is “yes,” because it’s not the Truth today.

Episode 241 was available until mid-2024 when Hildebrandt, Franke, and ConneXions removed the ConneXions podcasts from the internet. The statements made by Hildebrandt and ConneXions in this podcast episode are false and Hildebrandt and ConneXions knew them to be false at the time they were made because (i) Hildebrandt has no evidence, studies, research or any reasonable basis to claim that her ConneXions’ services and/or products are a means to treat any mental health disorder; and (ii) ConneXions’ services and/or products and Hildebrandt’s paradigm are designed to create, falsify, and/or exacerbate mental health issues through diagnosis of non-existent mental health disorders, destroy and deteriorate familial relationships, isolate of individuals from friends and family, and exert control over victims of the Enterprise to induce individuals to purchase fraudulent services and/or products from ConneXions to the financial gain of the Enterprise. As fully set forth in the Complaint, the purpose and consequence of Hildebrandt’s and ConneXions’ false representations made on the ConneXions podcast were to induce individuals to purchase fraudulent services through ConneXions for the financial benefit of the Enterprise.

5. Instances 5 through 736: In addition to the four instances identified above, Hildebrandt engaged in at least 732 instances of wire fraud when she hosted the ConneXions podcast. Each podcast was published on ConneXions’ website, Spotify, Apple Podcasts and a website called Acast.com. all of which use interstate wires.

6. Each podcast had its own individual weblink on Spotify, Acast and Apple Podcasts before Hildebrandt, Franke, and ConneXions removed the podcasts from the internet (<https://open.spotify.com/show/4wQNNVvDUehZDByrxUkRmf>; <https://shows.acast.com/connexions-classroom>; <https://podcasts.apple.com/us/podcast/connexions/id1372508129>)=. While the podcasts were functional, they were found on a single webpage on the ConneXions website (<https://www.connexionsclassroom.com/podcasts>). The podcasts played a vital role in the Enterprise's fraudulent scheme. The podcasts were designed to lure individuals into the Enterprise with the offer of a free service to attract them into purchasing additional for ConneXions services and/or products to the financial gain of the Enterprise, whereupon the Enterprise would gain new members either through indoctrination or extortion.

7. On each podcast episode, Hildebrandt and/or Franke and ConneXions instructs the listener to "start your training today at ConneXionsclassroom.com." Additionally, when ending most, if not all of said podcasts, the host instructs the listener to "[s]hare this podcast with your family and friends. And if you're not already subscribed, please subscribe to this podcast. You can find on-demand and live training at [connexionsclassroom.com](https://www.connexionsclassroom.com)."

8. At around the midway point of most podcast episodes, either Hildebrandt and/or Franke and ConneXions instructed the listener: "Do you like what you're hearing so far? Make sure you never miss a show by subscribing to our podcasts now or go to [connexionsclassroom.com](https://www.connexionsclassroom.com) and click 'Transform with Jodi.'" The "Transform with Jodi" webpage (<https://www.connexionsclassroom.com/transform-with-Jodi>) advertised costly products and/or services, including weekly community meetings (\$21 per week), men's or women's weekly team meetings (\$75 per week with a minimum three-week commitment); and

individual 50-minute sessions with Hildebrandt through ConneXions (\$181 per session). The “Transform with Jodi” link was one of the most visible buttons when accessing the ConneXions website.

9. The consequence of this act of wire fraud is that many individuals purchased fraudulent services and/or products through ConneXions for the financial benefit of the Enterprise.

10. As set forth herein, Hildebrandt hosted the ConneXions podcast on at least 183 occasions. Because these podcasts were published in four locations (Acast, Spotify, Apple Podcasts and the ConneXions website), each podcast constitutes four instances of wire fraud for a total of 732 instances.

11. Instances 737 through 763: Additional instances of federal wire fraud by Hildebrandt and ConneXions occurred via the ConneXions Couples panels. These ConneXions panels were held over Zoom, or other interstate wires. In these panels, Hildebrandt, ConneXions, and a number of other individuals (usually the same two or three couples) would share the Hildebrandt paradigm in an effort to recruit members to the Enterprise and sell individuals fraudulent services and/or products through ConneXions to the financial benefit of the Enterprise. As fully set forth in the Complaint, the purpose and consequence of Hildebrandt and ConneXions’ false representations made on the ConneXions Couples panels were to induce individuals to purchase fraudulent services and/or products through ConneXions for the financial benefit of the Enterprise. Hildebrandt directed at least twenty-seven panels, each an act of wire fraud:

- June 20, 2020
- July 25, 2020
- August 22, 2020
- September 26, 2020

- October 24, 2020
- November 21, 2020
- December 19, 2020
- January 23, 2021
- February 20, 2021
- March 20, 2021
- April 24, 2021
- May 22, 2021
- June 26, 2021
- July 31, 2021
- August 21, 2021
- September 18, 2021
- October 23, 2021
- November 20, 2021
- December 18, 2021
- January 22, 2022
- February 19, 2022
- March 18, 2022
- April 23, 2022
- May 21, 2022
- June 18, 2022
- July 23, 2022
- August 20, 2022

12. Instances 764 through 778: As set forth herein and in the Complaint, the representations and statements made in the ConneXions MasterClass constitute wire fraud. Hildebrandt taught the ConneXions Masterclass on at least two separate occasions: on or around April 15 through June 3, 2021 (once a week for 8 weeks) and January 19 through March 2, 2022 (once a week for 7 weeks), which constitutes fifteen more instances of wire fraud by Hildebrandt. In the ConneXions MasterClass, Hildebrandt and ConneXions disseminated Hildebrandt's paradigm to Enterprise victims. As fully set forth in the Complaint, the purpose and consequence of Hildebrandt and ConneXions' false representations made in the ConneXions MasterClass was to financially benefit the Enterprise, promote ConneXions' fraudulent services and/or products, and instruct Enterprise members how to implement Hildebrandt's methodologies to keep victims within the Enterprise for its financial benefit. Upon information

and belief, Hildebrandt routinely taught the ConneXions Masterclass on many other occasions not identified in the ConneXions Instagram.

13. Instances 779 through 785: Hildebrandt and ConneXions frequently engaged in additional acts of wire fraud at ConneXions conferences, another instance where Hildebrandt and ConneXions disseminated Hildebrandt's paradigm. Hildebrandt and ConneXions broadcast messages via Zoom (interstate wires) that were aimed to induce individuals to purchase fraudulent services and/or products through ConneXions for the financial benefit of the Enterprise. Examples include at least the following seven instances:

- Broadcasting the "Body Same" session at the ConneXions Women's retreat which occurred August 28–29, 2020;
- Broadcasting the "Boundaries ARE Love" session at the ConneXions Women's retreat which occurred August 28–29, 2020;
- Broadcasting the "Body / Soul Discipline" session at the ConneXions Men's retreat which occurred November 6–7, 2020;
- Broadcasting the "Boundaries ARE Love" session at the ConneXions Men's retreat which occurred November 6–7, 2020;
- Broadcasting the "CONTROL IS NOT LOVE" session at the ConneXions Women's retreat which occurred January 15–16, 2021;
- Broadcasting the "BOUNDARIES" session at the ConneXions Women's retreat which occurred January 15–16, 2021; and
- ConneXions Couple's Retreat which occurred September 24–25, 2021.

14. Additional Instances: Hildebrandt used interstate wires to make social media posts in furtherance of the Enterprise on the following accounts:

- The ConneXions Instagram page (<https://www.instagram.com/connexionscoaching/>);
- The Moms of Truth Instagram page (https://www.instagram.com/moms_of_truth/);
- ConneXions Facebook page (<https://www.facebook.com/connexionscoaching/>);
- The Moms of Truth Private Facebook page (<https://www.facebook.com/groups/momsoftruth/>);
- The Moms of Truth YouTube channel (link unavailable because YouTube deleted the account due to Franke and Hildebrandt violating creator guidelines);
- The ConneXions YouTube same (link unavailable for same reason);

15. These accounts contain thousands of additional instances of wire fraud by Hildebrandt.

16. Hildebrandt hosted the ConneXions podcast in the following instances wherein she made substantially similar representations to those identified in paragraphs 1 through 4 herein:

- Podcast 243: J. Hildebrandt, *Speaking the Truth about Death*, Aug. 26, 2023, <https://open.spotify.com/episode/6zpkxB2bRGDsD0OTh23fkLl>
- Podcast 241: J. Hildebrandt, *Holding onto Trauma Will Make You Sick*, Aug. 11, 2023, <https://open.spotify.com/episode/46g3dc0BWN7TRtNH0Y03qc>
- Podcast 239: J. Hildebrandt, *Drinking and Drugs Are Not the Problem*, July 28, 2023, <https://open.spotify.com/episode/5LReffoLuUzXBZ1GaXCYgV>
- Podcast 237: J. Hildebrandt, *Mother's Instinct to Protect*, July 14, 2023, <https://open.spotify.com/episode/0coDanygcgdTw2MIGhm9DJ>
- Podcast 235: J. Hildebrandt, *My Child's Caliber of Choices*, July 7, 2023, <https://open.spotify.com/episode/71wpctHbBbhEjAc1YK2TN0>
- Podcast 233: J. Hildebrandt, *Can Fear Ever Be Truthful?*, July 1, 2023, <https://open.spotify.com/episode/6t2AZQBohAWxh3oPyFceBO>
- Podcast 231: J. Hildebrandt, *Taking Responsibility for Childhood Trauma... Through Forgiveness*, June 23, 2023, <https://open.spotify.com/episode/1htrHUE9y8YnKPagkKATvV>
- Podcast 229: J. Hildebrandt, *How Parents Manage when Children Won't Manage Themselves*, June 16, 2023, <https://open.spotify.com/episode/2lzxVrgkg1jPq97bApJZh>
- Podcast 227: J. Hildebrandt, *Counterfeits of Connection*, June 10, 2023, <https://open.spotify.com/episode/0W1UavxSfyTvsP8jjSEQBY>
- Podcast 225: J. Hildebrandt, *Fruits of Living in Truth*, June 2, 2023, <https://open.spotify.com/episode/1VfV0RxH1104TpmunTqosC>
- Podcast 223: J. Hildebrandt, *Gen Z Desires Truth*, May 27, 2023, <https://open.spotify.com/episode/5NkQomLoJAcyURhoIB0EYp>
- Podcast 221: J. Hildebrandt, *My Son Wants to Wear Girl Clothes, Addressing Confusions with Principles*, May 19, 2023, <https://open.spotify.com/episode/0jSxyVEcl5xdWzn5bjANd9>
- Podcast 219: J. Hildebrandt, *My Child Doesn't Want to Go to Church*, May 13, 2023, <https://open.spotify.com/episode/6UinD1152dPDweC2RRa7t0>
- Podcast 217: J. Hildebrandt, *Teaching Truth to Toddlers*, May 5, 2023, <https://open.spotify.com/episode/7Ltf5r1mEEC1IcD49csk6T>
- Podcast 215: J. Hildebrandt, *Is My Child Ready to Date?*, April 28, 2023, <https://open.spotify.com/episode/29zZPnKbBIImMWdSvUVtkme>
- Podcast 213: J. Hildebrandt, *The Antidote to Suicide*, April 21, 2023, <https://open.spotify.com/episode/0LkWVQxN9VCdL6McIRu1gY>

- Podcast 211: J. Hildebrandt, *Parent & Teen Tug-of-War*, April 14, 2023, <https://open.spotify.com/episode/4Vq2ooZ3gD2Je5DG1fTlyF>
- Podcast 209: J. Hildebrandt, *From Teen Pregnancy to Responsibility*, April 7, 2023, <https://open.spotify.com/episode/40ViVjCkxsMEHauU8uKLQA>
- Podcast 207: J. Hildebrandt, *Teens Numb Responses to Pornography*, March 31, 2023, <https://open.spotify.com/episode/75onUZfcyzgq5fOGurazUH>
- Podcast 205: J. Hildebrandt, *Millennials Desire to Live in Truth*, March 24, 2023, <https://open.spotify.com/episode/4VPbNL7F8xeX5mZGGPzJKc>
- Podcast 203: J. Hildebrandt, *Teaching Tenacious Children Truth*, March 17, 2023, <https://open.spotify.com/episode/0VMwLKyTrHyb1IXpH71kcB>
- Podcast 201: J. Hildebrandt, *The Three Pillars of Self-Esteem*, March 10, 2023, <https://open.spotify.com/episode/3ZjYWIggL0RgrXq5xJSv1k>
- Podcast 199: J. Hildebrandt, *Truthful Protective Anger*, March 3, 2023, <https://open.spotify.com/episode/2HnRbMa1yVf5n8nSPH1Wzv>
- Podcast 197: J. Hildebrandt, *Why Parents Fear Intervening on Behalf of Their Child*, Feb. 24, 2023, <https://open.spotify.com/episode/3PfGzmTo55uvKGA1xaZXgm>
- Podcast 195: J. Hildebrandt, *Are You Dealing with Entitled Adult Children?*, Feb. 17, 2023, <https://open.spotify.com/episode/5CjDMFKYkFAEoS0cyVogM3>
- Podcast 193: J. Hildebrandt, *The Distortion Underneath Copping an Attitude*, Feb. 10, 2023, <https://open.spotify.com/episode/3XTXxvGG4I5hjhAwC1XaAM>
- Podcast 191: J. Hildebrandt, *Entitlement Is a Lack of Empathy*, Feb. 3, 2023, <https://open.spotify.com/episode/0MqXmXggMIo2RyvYduThff>
- Podcast 189: J. Hildebrandt, *Man's Law vs. God's Law... Which Do I Follow?*, Jan. 27, 2023, <https://open.spotify.com/episode/0rKgn1CnWMmV6aLZT4uaai>
- Podcast 187: J. Hildebrandt, *You vs. Me: The Monumental Setup*, Jan. 20, 2023, <https://open.spotify.com/episode/6Xo2BwoYDOo9JtF6xGgWzz>
- Podcast 185: J. Hildebrandt, *Why Is there Jealousy in who is the Bread Winner?*, Jan. 13, 2023, <https://open.spotify.com/episode/17DVYDhiXtsVdurx4VFXFl>
- Podcast 183: J. Hildebrandt, *GOT SELF-ESTEEM??? NEED SELF-ESTEEM??? Come Learn... What Is Your Responsibility!*, Jan. 6, 2023, <https://open.spotify.com/episode/5jBhut01MxRjYf9Nos5V3x>
- Podcast 181: J. Hildebrandt, *Do I Punish My Child or Hold Them Accountable?*, Dec. 30, 2022, <https://open.spotify.com/episode/2FqEj7auEbA5iJcbsADv1L>
- Podcast 179: J. Hildebrandt, *Can You Celebrate ... Santa Clause in the Truth?*, Dec. 23, 2022, <https://open.spotify.com/episode/1zYkHy07Zv3OIoSq08bUIz>
- Podcast 177: J. Hildebrandt, *I've Sinned... and I Want to Change! Can I Repent?*, Dec. 16, 2022, <https://open.spotify.com/episode/50QcrdULzUPgDw1WEmotAA>
- Podcast 175: J. Hildebrandt, *What Does an Entitled 17-Year-Old Look Like?*, Dec. 9, 2022, <https://open.spotify.com/episode/3PJmujNt8qRmQ3LqJzm45s>
- Podcast 173: J. Hildebrandt, *Is there Ever a Time to CONTROL Your Loved One?*, Dec. 3, 2022, <https://open.spotify.com/episode/3nYpOOfmnmqypp7YE1u53i>
- Podcast 171: J. Hildebrandt, *Should I Keep this Relationship?*, Nov. 25, 2022, <https://open.spotify.com/episode/5HWeXKKEXLX7A43uxAleGD>

- Podcast 169: J. Hildebrandt, *Waking Up...to Our Murderous Hearts ROE OVERTURNED*, Nov. 25, 2022, <https://open.spotify.com/episode/4wQoxDZJmyDoiaqyVvxcmm>
- Podcast 167: J. Hildebrandt, *Protecting Children from the Dangers of Technology*, Nov. 25, 2022, <https://open.spotify.com/episode/30MzZZAdGitnphFjdAbNIL>
- Podcast 165: J. Hildebrandt, *My Opinion Does Not Constitute the Truth*, Nov. 25, 2022, <https://open.spotify.com/episode/2axmW0iD9Zfh10sAI82zsG>
- Podcast 163: J. Hildebrandt, *Learn how IMAGINATION can be in Truth or distortion*, Nov. 25, 2022, <https://open.spotify.com/episode/56oI4aovTqZJn9o9o9m9OT>
- Podcast 161: J. Hildebrandt, *Can I CHOOSE to Break Commandments, Violate Spiritual Laws, Engage in Sexual Deviancy and STILL CALL MYSELF A CHRISTIAN*, Nov. 25, 2022, <https://open.spotify.com/episode/0n0OajYmKBRMRtmntW544J>
- Podcast 159: J. Hildebrandt, *Who's Entitled to the Grandchildren?*, Nov. 25, 2022, <https://open.spotify.com/episode/7kNEYC2vFRh4sT0jk1ka3I>
- Podcast 157: J. Hildebrandt, *What Do You Do When an 18-Year-Old Is UNWILLING to...Adult?*, Nov. 25, 2022, <https://open.spotify.com/episode/6oJBQGQPzAITmxr3qcLz5F>
- Podcast 155: J. Hildebrandt, *Is There Lust in Your Marriage?*, Nov. 25, 2022, <https://open.spotify.com/episode/2IIG4DNhAxMv0bggS8pIDO>
- Podcast 153: J. Hildebrandt, *Children & Obedience... Is It That Important?*, Nov. 25, 2022, <https://open.spotify.com/episode/5UaHNrpIlk0kUPSN19AJ3x>
- Podcast 151: J. Hildebrandt, *I'm a Teen and... I Deserve a Phone??*, Nov. 25, 2022, <https://open.spotify.com/episode/6yfZAp8eby373iM1lLWZu4>
- Podcast 149: J. Hildebrandt, *How I Learned About Truth & Distortion*, Nov. 25, 2022, <https://open.spotify.com/episode/1PRnL6tQQhB4D9NCmsJqcs>
- Podcast 147: J. Hildebrandt, *Hitting Children Creates Fear*, Nov. 25, 2022, <https://open.spotify.com/episode/3VoKP7TiL5OPgDo6sLm26P>
- Podcast 145: J. Hildebrandt, *Does God "LET" Bad Things Happen?*, Nov. 25, 2022, <https://open.spotify.com/episode/5QV6cYmrqMAXg1MCn3e0Gf>
- Podcast 143: J. Hildebrandt, *Why Are Our Children Lusting?*, Nov. 25, 2022, <https://open.spotify.com/episode/1RZ7BhdbS2JB3a4kmvrRZW>
- Podcast 141: J. Hildebrandt, *Is Your Posterity Punishing You Because You Told Them NO?*, Nov. 25, 2022, <https://open.spotify.com/episode/3UpyMF9dVooqYgsAmLFvvB>
- Podcast 139: J. Hildebrandt, *Can My Daughter Miss Church in Truth*, Nov. 25, 2022, <https://open.spotify.com/episode/0XHa6JiFPeNIdbdH9b77lh>
- Podcast 137: J. Hildebrandt, *Gender Just Is*, Nov. 25, 2022, <https://open.spotify.com/episode/2ZETlbyXqYsTNI29026XoO>
- Podcast 135: J. Hildebrandt, *Are Chemicals in Your Body... Okay?*, Nov. 25, 2022, <https://open.spotify.com/episode/5LN11ECd14LWwZHdgZKfHk>
- Podcast 133: J. Hildebrandt, *Am I Too Old to Learn about Truth/God?*, Nov. 25, 2022, <https://open.spotify.com/episode/01MoWmcTD4gqE7gvyVhU2e>
- Podcast 132: J. Hildebrandt, *Generational Distortion*, Nov. 25, 2022, <https://open.spotify.com/episode/7KWCM0onAxQqKha26YSBTA>

- Podcast 129: J. Hildebrandt, *Teaching Children About Truth vs. Distortion*, Nov. 25, 2022, <https://open.spotify.com/episode/60jiLMkvSBn0m5MEwIouxF>
- Podcast 127: J. Hildebrandt, *LIES YOU BELIEVE About Abortion*, Nov. 25, 2022, <https://open.spotify.com/episode/4oSdrtMn3p0M0dAEwbNlmY>
- Podcast 125: J. Hildebrandt, *How Do I Not Choose Distortion*, Nov. 25, 2022, <https://open.spotify.com/episode/74ckFjX79BLtMLbzT2DaKa>
- Podcast 123: J. Hildebrandt, *Comforting HUMILIATED Daughter*, Nov. 25, 2022, <https://open.spotify.com/episode/4pKHhuSXU4tkGWUqre7uz0>
- Podcast 121: J. Hildebrandt, *Separation... A Principle of Truth*, Nov. 25, 2022, <https://open.spotify.com/episode/093fu8vwgIGTooDrddmGB4>
- Podcast 120: J. Hildebrandt, *FEAR...IT'S NOT PERSONAL*, Nov. 25, 2022, <https://open.spotify.com/episode/0PPYkJLFktxXn0ey7OTw9N>
- Podcast 119: J. Hildebrandt, *Worth = Worthy?*, Nov. 25, 2022, <https://open.spotify.com/episode/36fpTJ5Ry4Aq1pXfCh0BYH>
- Podcast 118: J. Hildebrandt, *ME, MY AND I . . . YOUR GREATEST ENEMY OR ALLY?*, Nov. 25, 2022, <https://open.spotify.com/episode/6XqukFAI9R81jKrTrkuKfA>
- Podcast 117: J. Hildebrandt, *Relationships vs. Dynamics*, Nov. 25, 2022, <https://open.spotify.com/episode/098sY4VOZeeK6wa4k7tiHX>
- Podcast 116: J. Hildebrandt, *Life is hard . . . hard is necessary*, Nov. 25, 2022, <https://open.spotify.com/episode/4TSYZjY7WMxYqdwotpHXoC>
- Podcast 115: J. Hildebrandt, *Enabling Controlling vs. Surrender*, Nov. 25, 2022, <https://open.spotify.com/episode/7aJzgZq3IPDeIxolEkCNLH>
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- Podcast 111: J. Hildebrandt, *What is Love...?*, Nov. 25, 2022, <https://open.spotify.com/episode/0tloMOFLz36KYQns7emXxZ>
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- Podcast 81: J. Hildebrandt, *Family Dynamics—Rule & Roles*, Nov. 25, 2022, <https://open.spotify.com/episode/3vSKwd4eucnCZwFDDzsR2r>
- Podcast 80: J. Hildebrandt, *Parenting—Control & Co-Dependency*, Nov. 25, 2022, <https://open.spotify.com/episode/75sfJTAMafNTD827RoNmO6>
- Podcast 79: J. Hildebrandt, *Repentance—Through Clean up (Part Two)*, Nov. 25, 2022, <https://open.spotify.com/episode/3Q0n2sMB6ZQM0lhwcw7YuM>
- Podcast 78: J. Hildebrandt, *Repentance—Through Clean Up (Part One)*, Nov. 25, 2022, <https://open.spotify.com/episode/0XtEJsFXIMUwZudeqvBpNn>
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- Podcast 76: J. Hildebrandt, *Parenting—Triggers*, Nov. 25, 2022, <https://open.spotify.com/episode/53fltAJeOknuEC9L1Zy6oG>
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- Podcast 72: J. Hildebrandt, *Parenting—Teaching the Power of Choice*, Nov. 25, 2022, <https://open.spotify.com/episode/1GJ7IyZ4ma8gPC1v79jIwz>
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- Podcast 69: J. Hildebrandt, *Protective Gift of Enmity Anger*, Nov. 25, 2022, <https://open.spotify.com/episode/7A5gSaKzQxV34yG6Y9cXxB>
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- Podcast 67: J. Hildebrandt, *Recovery Check-In's*, Nov. 25, 2022, <https://open.spotify.com/episode/1IzOmDmd89oEXtExag5LOj>
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- Podcast 62: J. Hildebrandt, *Loss & Grief*, Nov. 25, 2022, <https://open.spotify.com/episode/1Cv6zw1iX3YNsv3wJJyoSX>
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- Podcast 57: J. Hildebrandt, *Unconditional Self-Love*, Nov. 25, 2022, <https://open.spotify.com/episode/5rk7MCdaaGM9eqWepnndIp>
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- Podcast 55: J. Hildebrandt, *Drama—Inviting Someone Out*, Nov. 25, 2022, <https://open.spotify.com/episode/2M60Esc06EBbjSHH851Akz>
- Podcast 54: J. Hildebrandt, *Perceptions & Boundaries*, Nov. 25, 2022, <https://open.spotify.com/episode/0zkbdTSEgtghFBdZy12UyV>
- Podcast 53: J. Hildebrandt, *Healthy Relationships*, Nov. 25, 2022, <https://open.spotify.com/episode/7f8ChfTRYPJYruU8CGuDBk>
- Podcast 52: J. Hildebrandt, *Validation & Vulnerability*, Nov. 25, 2022, <https://open.spotify.com/episode/671ofrqaodUkeNYP37P4nk>
- Podcast 51: J. Hildebrandt, *Shame’s Affects [sic] on Relationships*, Nov. 25, 2022, <https://open.spotify.com/episode/0NRZ8YeEZvM6ve4e70kuOF>
- Podcast 50: J. Hildebrandt, *Personal Responsibility vs. False Beliefs*, Nov. 25, 2022, <https://open.spotify.com/episode/6kGpdZseKdGTRUQG1zNE4D>
- Podcast 49: J. Hildebrandt, *Outcomes of Distortion*, Nov. 25, 2022, <https://open.spotify.com/episode/7bPnJSMvwYFkqm9n0AzFs6>
- Podcast 48: J. Hildebrandt, *Distortion in Relationships*, Nov. 25, 2022, <https://open.spotify.com/episode/2m1Eqe3KPFWvvLtrwcsJhb>
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- Podcast 46: J. Hildebrandt, *Self-Care & Love*, Nov. 25, 2022, <https://open.spotify.com/episode/32VZ82OLkljmwfflIOiUTR>
- Podcast 45: J. Hildebrandt, *Commitment, Character, & Change*, Nov. 25, 2022, <https://open.spotify.com/episode/5GjqEfErtnQTcIeHt8rd02>
- Podcast 44: J. Hildebrandt, *Emotional Honesty & Safety*, Nov. 25, 2022, <https://open.spotify.com/episode/1iVrFxXwTbYR2PnHGVnSDB>
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- Podcast 41: J. Hildebrandt, *Power of Choice*, Nov. 25, 2022, <https://open.spotify.com/episode/2FcDwwEwXJcOWYpG0phjAN>
- Podcast 40: J. Hildebrandt, *Gratitude—A Gift for Self*, Nov. 25, 2022, <https://open.spotify.com/episode/55xsxLLPIQanz6NICflsh7>
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- Podcast 27: J. Hildebrandt, *Anger & Resentments*, Nov. 25, 2022, <https://open.spotify.com/episode/4kHxs8Ea1WsNp0bnmnGczR>
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- Podcast 13: J. Hildebrandt, *Motive & Choice*, Nov. 25, 2022, <https://open.spotify.com/episode/7yfv6uZzLUivf08zQoryk6>
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- Podcast 5: J. Hildebrandt, *Boundaries, Responsibility, & Validation*, Nov. 25, 2022, <https://open.spotify.com/episode/2V7nFg1B1AY2VYLzXpwBYP>
- Podcast 4: J. Hildebrandt, *Fear*, Nov. 25, 2022, <https://open.spotify.com/episode/4htN4ylqqI3hDwcfNSqSUx>
- Podcast 3: J. Hildebrandt, *Shame & False Beliefs*, Nov. 25, 2022, <https://open.spotify.com/episode/3ZhpCBux5ASR5ov6psesNi>
- Podcast 2: J. Hildebrandt, *Understanding Distortion*, Nov. 25, 2022, <https://open.spotify.com/episode/7o8KsUC3rtQBfTWmzVA1Ky>
- Podcast 1: J. Hildebrandt, *Connection--The Greatest Human Need*, Nov. 25, 2022, <https://open.spotify.com/episode/5qifFWkU8Gdx54akPqhgyTY>
- Podcast 0: J. Hildebrandt, *Choice & Outcome*, Nov. 25, 2022, <https://open.spotify.com/episode/5qifFWkU8Gdx54akPqhgyTY>

Franke and ConneXions

17. Instance 1: In the ConneXions podcast Episode 234, “*I’m Responsible for What Comes in My Home*,” released via Spotify and other platforms on July 4, 2023, (<https://open.spotify.com/episode/5mEsRX9l4B4yMHHi9kTD3d>), Franke and ConneXions represented “I will be a safe place for anybody to come to. If someone wants to come to me and

enjoy my safety, I will offer my love to them.” Episode 234 was available until mid-2024 when Hildebrandt, Franke, and ConneXions removed the ConneXions podcasts from the internet. The statements made by Franke and ConneXions in this podcast episode are false and Franke and ConneXions knew them to be false at the time they were made because at the time Franke and ConneXions made these statements, Hildebrandt and Franke were physically torturing Victim 1 and Victim 2 and thus were not “be[ing] a safe place.” As fully set forth in the Complaint, the purpose and consequence of Franke and ConneXions’ false representations made on the ConneXions podcast were to induce individuals to purchase fraudulent services and/or products through ConneXions for the financial benefit of the Enterprise. Franke and ConneXions’ false representations made on Episode 234 also had the purpose and consequence of obscuring the main objective of the Enterprise to perpetuate child abuse and torture.

18. Instance 2: On the ConneXions YouTube channel in a video published on February 25, 2023, Franke, on behalf of Franke, Hildebrandt, and ConneXions, states that Franke, Hildebrandt, and ConneXions “strongly disapprove of abuse. I think all of us could get on board with, yeah, ‘I have righteous anger toward adults abusing children.’” Franke then indicates that she disapproves of children being “exploited” and used as “tools” and “pawns.” In the video, Hildebrandt nods in agreement with Franke’s statements. This video was available until around August or September 2023 when YouTube deleted the ConneXions channel for violating YouTube’s “creator responsibility guidelines.” Although the video in its entirety is not available on YouTube given the account deletion, a portion of the video that shows Franke, Hildebrandt, and ConneXions making this fraudulent statement is available on another user’s YouTube channel. The statements made by Franke, Hildebrandt, and ConneXions in this YouTube video are false and Franke, Hildebrandt, and ConneXions knew them to be false at the

time they were made because at the time Franke, Hildebrandt, and ConneXions made these statements, Franke had tortured and abused her children for years with Hildebrandt's knowledge and approval and Hildebrandt actively counseled individuals on the "benefits" and "propriety" of utilizing child abuse and child torture to bring individuals into "Truth" and had abused and tortured children, including family members, for years. As fully set forth in the Complaint, the purpose and consequence of Franke and ConneXions' false representations made on the ConneXions podcast were to induce individuals to purchase fraudulent services and/or products through ConneXions for the financial benefit of the Enterprise.

19. Instance 3: Franke and ConneXions posted a reel to the ConneXions Instagram page @connexionscoaching (https://www.instagram.com/reel/Ck_KtJFDTea/) on November 15, 2022. In the video, Franke states:

You wonder where I've been on my vlogs? You wonder why I left YouTube? Is to save my kids. No amount of money, and, and I'm telling ya, I was making millions and I left it because my kids were being hurt with entitlement; they were being hurt with people's advice and they didn't have a mother at the front saying, "I don't care what the world's opinion is; this is the Truth and this is where I stand." And fortunately I had a chance, I had them in my home long enough to do it. And I'm not gonna lose them. They're seeing Truth, they're accepting Truth, they're loving Truth. And so this is my passion is to invite you to stand in Truth and put your opinion to the side for a minute. Because your kids are the target of distortion.

This page and video remain active as of the date of this filing. The statements made in this video are false, and Franke and ConneXions knew them to be false at the time they were made because at the time Franke and ConneXions made these statements, Franke had tortured and abused her children for years and was actively torturing and abusing her children because they had not accepted Hildebrandt's "Truth." As fully set forth in the Complaint, the purpose and consequence of Franke and ConneXions' false representations made on the ConneXions podcast were to induce individuals to purchase fraudulent services and/or products through ConneXions

for the financial benefit of the Enterprise. Franke and ConneXions' false representations made in this video also had the purpose and consequence of obscuring the main objective of the Enterprise to perpetuate child abuse and torture. Franke and ConneXions' false representations made in this video had the further purpose and consequence to falsely represent that ConneXions' purpose is to provide legitimate family counseling services and products.

20. Instance 4: In the ConneXions podcast Episode 224, released via Spotify and other platforms on May 30, 2023 (<https://open.spotify.com/episode/3fCnHuXhUXCmlrpMhfJFOJ>), Franke and ConneXions represented that individuals need to understand "Truth" and that "Truth and Principles" will aid those who follow the instructions and counseling of Hildebrandt and ConneXions. Episode 224 was available until mid-2024 when Hildebrandt, Franke, and ConneXions removed the ConneXions podcasts from the internet. The statements made by Franke and ConneXions in this podcast are false and Franke and ConneXions knew them to be false because ConneXions' services and/or products and the Enterprise's vernacular of "Truth" and "Principle" are designed to create, falsify, and/or exacerbate mental health issues through diagnosis of non-existent mental health disorders, destroy and deteriorate familial relationships, isolate of individuals from friends and family, and exert control over victims of the Enterprise to induce individuals to purchase fraudulent services and/or products from ConneXions to the financial gain of the Enterprise. As fully set forth in the Complaint, the purpose and consequence of Franke's and ConneXions' false representations made on the ConneXions podcast were to induce individuals to purchase fraudulent services through ConneXions for the financial benefit of the Enterprise.

21. Instances 5 through 248: As set forth herein, each instance of the ConneXions podcast constitutes an instance of wire fraud. Franke hosted the ConneXions podcast 61 times,

and thus engaged in at least 244 instances of wire fraud when she hosted the ConneXions podcast because Franke and ConneXions published each podcast episode on four different platforms (Spotify, Apple Podcasts, Acast and the ConneXions website) as described above.

22. Instances 249 through 263: As set forth in paragraph 11 herein, representations made at the ConneXions Couples panels constitute wire fraud. Franke appeared as a panelist on fifteen ConneXions Couples panels and thereby committed at least fifteen additional instances of wire fraud on the following dates:

- June 20, 2020
- October 24, 2020
- December 19, 2020
- January 23, 2021
- February 20, 2021
- March 20, 2021
- April 23, 2021
- June 26, 2021
- July 31, 2021
- August 21, 2021
- On or about October 27, 2021
- November 20, 2021
- December 18, 2021
- January 22, 2022
- February 19, 2022

23. Instances 264 through 294: Franke engaged in multiple additional instances of wire fraud via the ConneXions Instagram account, which constitutes an interstate wire. In ConneXions Instagram videos, she and her now-estranged husband advocate and further the Enterprise's fraudulent scheme by advertising and promoting ConneXions' fraudulent services and/or products. These posts remain active on Instagram. The purpose and consequence of these instances were to induce individuals to purchase fraudulent services and/or products through ConneXions for the financial benefit of the Enterprise. These instances of wire fraud occur in at least thirty-one instances on the following dates:

- October 6, 2020
- October 16, 2020
- February 27, 2021
- April 12, 2021
- April 27, 2021
- May 3, 2021
- May 6, 2021
- May 12, 2021
- June 29, 2021
- July 21, 2021
- August 10, 2021
- August 20, 2021
- August 24, 2021
- August 31, 2021
- September 4, 2021
- September 8, 2021
- September 15, 2021
- September 21, 2021
- September 27, 2021
- October 5, 2021
- October 9, 2021
- October 14, 2021
- October 20, 2021
- November 2, 2021
- November 29, 2021
- December 9, 2021
- January 7, 2022
- January 25, 2022
- February 7, 2022
- February 17, 2022
- May 19, 2022

24. Instances 295 through 298: Like Hildebrandt, Franke engaged in additional acts of wire fraud at ConneXions conferences. Franke and ConneXions broadcast messages via Zoom (interstate wires) that were aimed to induce individuals to purchase fraudulent services and/or products through ConneXions for the financial benefit of the Enterprise. Examples include at least the following four occasions:

- Broadcasting the “Culture and Truth” session at the ConneXions Women’s retreat which occurred August 28–29, 2020;
- Participating in the parenting panel at the ConneXions Women’s retreat which occurred August 28–29, 2020;

- Broadcasting the “LIVING A PRINCIPLED LIFE” session at the ConneXions Women’s retreat dated January 15–16, 2021; and
- ConneXions Couple’s Retreat which occurred September 24–25, 2021.

25. Additional Instances: Franke used interstate wires to make social media posts in furtherance of the Enterprise on the following accounts:

- The ConneXions Instagram page (<https://www.instagram.com/connexionscoaching/>);
- The Moms of Truth Instagram page (https://www.instagram.com/moms_of_truth/);
- ConneXions Facebook page (<https://www.facebook.com/connexionscoaching/>);
- The Moms of Truth Private Facebook page (<https://www.facebook.com/groups/momsoftruth/>);
- The Moms of Truth YouTube channel (link unavailable because YouTube deleted the account due to R. Franke and J. Hildebrandt violating creator guidelines); and
- The ConneXions YouTube same (link unavailable for same reason).

26. Franke hosted the ConneXions podcast in the following instances wherein she made substantially similar representations to those identified in paragraphs 18 through 21 herein:

- Podcast 242: R. Franke, *Keeping Kids Safe in a Predatory Society*, Aug. 18, 2023, <https://open.spotify.com/episode/1hhEzLSoc40NrepNNfrqpO>
- Podcast 240: R. Franke, *Distorted Boredom*, Aug. 4, 2023, <https://open.spotify.com/episode/1lKhqGc88h6jz0hmscopyP>
- Podcast 238: R. Franke, *Parable of the Pineapple*, July 21, 2023, <https://open.spotify.com/episode/5eaexnIYnga0qegV4stqNZ>
- Podcast 236: R. Franke, “*Preserve the Relationship*”, July 11, 2023, <https://open.spotify.com/episode/139WiQH5uU2gIj3ghpROtP>
- Podcast 234: R. Franke, *I’m Responsible for What Comes in My Home*, July 4, 2023, <https://open.spotify.com/episode/5mEsRX9l4B4yMHHi9kTD3d>
- Podcast 232: R. Franke, *Can You Go Overboard on Boundaries*, June 27, 2023, <https://open.spotify.com/episode/3UHPGDJqEHZyq49A5XkLzk>
- Podcast 230: R. Franke, *Honor Thy Father & Thy Mother... Even when They Are In Distortion*, June 21, 2023, <https://open.spotify.com/episode/7ltwNlrJNZVlcYbIlzMs9S>
- Podcast 228: R. Franke, *Be a Peacemaker*, June 14, 2023, <https://open.spotify.com/episode/6X5x70HNDx2P5QfyvYn4KG>
- Podcast 226: R. Franke, *Can I GET Others to Live in Truth?*, June 6, 2023, <https://open.spotify.com/episode/0YPI4FnITk2SFEhkfn2jkH>
- Podcast 224: R. Franke, *Where Does Compassion Fit In?*, May 30, 2023, <https://open.spotify.com/episode/3fCnHuXhUXCmlrpMhfJFOJ>
- Podcast 222: R. Franke, *Denial Around Eating Disorders*, May 23, 2023, <https://open.spotify.com/episode/1nlSyx22adNRCtmFp3aSXA>

- Podcast 220: R. Franke, *Parenting without Village Support*, May 16, 2023, <https://open.spotify.com/episode/3Dri01coFAhP7tDyT9U0U5>
- Podcast 218: R. Franke, *The Internally Motivated Child vs the Externally Motivated Child*, May 9, 2023, <https://open.spotify.com/episode/3bTAL0IPJYeVhjkMRgNVqw>
- Podcast 216: R. Franke, *Demanding Adult Children*, May 2, 2023, <https://open.spotify.com/episode/00ECacNlaM3Nz001iacjUg>
- Podcast 214: R. Franke, *Denial of Death Leads to Destructive Living*, April 25, 2023, <https://open.spotify.com/episode/2pCoRRbTluwloMdeWWYcpN>
- Podcast 212: R. Franke, *Fighting the REAL Enemy in Your Home*, April 18, 2023, <https://open.spotify.com/episode/60Pj3WNzamdZEBkilbgl7e>
- Podcast 210: R. Franke, *What Does a Manipulative Parent Sound Like?*, April 11, 2023, <https://open.spotify.com/episode/1HFLSQyGuoZe32UMIWTjhr>
- Podcast 208: R. Franke, *Standing in Truth without Family Support*, April 4, 2023, <https://open.spotify.com/episode/0cp78ZIW06qvp5OOaNr1mW>
- Podcast 206: R. Franke, *Truth & Religion*, March 28, 2023, <https://open.spotify.com/episode/754gTehbk3ymG6EEKCG2zR>
- Podcast 204: R. Franke, *Are Makeup & Hair Color Distorted?*, March 21, 2023, <https://open.spotify.com/episode/370KwdIU8ZrIPKP6gmf0Ik>
- Podcast 202: R. Franke, *Be a Refuge for Your Loved Ones*, March 14, 2023, <https://open.spotify.com/episode/5FNoqwk4mJXhXnmIpbEQ51>
- Podcast 200: R. Franke, *Don't Get Stuck in Parental Regret*, March 7, 2023, <https://open.spotify.com/episode/4KgYF0bBlu6PSrtajDbN4d>
- Podcast 198: R. Franke, *Break Your Dependency on Social Media*, Feb. 28, 2023, <https://open.spotify.com/episode/3hvHKLtZd6noMnxk5TnoA>
- Podcast 196: R. Franke, *Teaching Modesty to Teens*, Feb. 21, 2023, <https://open.spotify.com/episode/02qZakYBXkGfEBPCH8OoSq>
- Podcast 194: R. Franke, *Truthful Choices in Womanhood*, Feb. 14, 2023, <https://open.spotify.com/episode/79xVx5SpGEbu99fO6r8Z8F>
- Podcast 192: R. Franke, *There is no Truth to the Terrible Twos*, Feb. 7, 2023, <https://open.spotify.com/episode/1w1UIE98mJ8ZEDJIQjNEP2>
- Podcast 190: R. Franke, *Navigating the Drama of Divorced Parenting*, Jan. 31, 2023, <https://open.spotify.com/episode/05gmYIu3rkKPMMwNKQsil5>
- Podcast 188: R. Franke, *Transforming Pain into Wisdom*, Jan. 24, 2023, <https://open.spotify.com/episode/2xZYWB53kIDm5Uixui3Tdt>
- Podcast 186: R. Franke, *Why Some People Don't Want to Change*, Jan. 17, 2023, <https://open.spotify.com/episode/4aW2pBXAQbEYByqdTwI7JC>
- Podcast 184: R. Franke, *Boundaries Inside Sexual Intimacy*, Jan. 10, 2023, <https://open.spotify.com/episode/7C6G7dmVNujCS6FhRAjlrc>
- Podcast 182: R. Franke, *Dieting and Distortion*, Jan. 3, 2023, <https://open.spotify.com/episode/4rCcnxtfYYI4vukLC4EC9i>
- Podcast 180: R. Franke, *What is Love Inside Marriage?*, Dec. 27, 2022, <https://open.spotify.com/episode/2BjRreaeQFJdqZyGYImFgi>
- Podcast 178: R. Franke, *Intimacy Problems in Marriage*, Dec. 12, 2022, <https://open.spotify.com/episode/7CIuvmhK5Oc53iRG78LDLZ>

- Podcast 176: R. Franke, *My Christmas Gift & Yours*, Dec. 13, 2022, <https://open.spotify.com/episode/4LYHTMOi2p914g3VB6C88r>
- Podcast 174: R. Franke, *Why I Need Values in My Life*, Dec. 7, 2022, <https://open.spotify.com/episode/2euS4qiYOmOwhFbcKZZ92D>
- Podcast 172: R. Franke, *The TRUTH Beneath the Denigrating Doormat*, Nov. 30, 2022, <https://open.spotify.com/episode/0zt488vVR5AW8HuhmwlMeh>
- Podcast 170: R. Franke, *What Lengths Would You Go to Protect Your Child?*, Nov. 25, 2022, <https://open.spotify.com/episode/1VSBGrYuzsEEIqlyhPXbZE>
- Podcast 168: R. Franke, *In the Trenches of Motherhood*, Nov. 25, 2022, <https://open.spotify.com/episode/1HquwXxV0xG7kE6mDUDpen>
- Podcast 166: R. Franke, *Gone Are the Days of Family Movies*, Nov. 25, 2022, <https://open.spotify.com/episode/5XuJ5mA82OEtWnObXmAK4r>
- Podcast 164: R. Franke, *Do You REALLY Know What is Coming into Your Home?*, Nov. 25, 2022, <https://open.spotify.com/episode/0My1VwLKJo8rmjxAliAvlL>
- Podcast 162: R. Franke, *Worship of Children, the Modern Golden Calf*, Nov. 25, 2022, <https://open.spotify.com/episode/6rXa5RQHTDckTPjMSu2Rfv>
- Podcast 160: R. Franke, *Overcoming Anger*, Nov. 25, 2022, <https://open.spotify.com/episode/5haqYBPZ1NPgpM4Sjc9GCS>
- Podcast 158: R. Franke, *Feeling Accepted is MY Responsibility*, Nov. 25, 2022, <https://open.spotify.com/episode/0RknHC39K6lwItwAgrB25K>
- Podcast 156: R. Franke, *Interfaith Marriage: How to Create Strength*, Nov. 25, 2022, <https://open.spotify.com/episode/1SPfpMkzn2b0nN4vLCu9gv>
- Podcast 154: R. Franke, *The Disintegration of Society*, Nov. 25, 2022, <https://open.spotify.com/episode/42yYgH7ViNSnbWlY0ubWnY>
- Podcast 152: R. Franke, *The Principle of Suffering and Roe V Wade*, Nov. 25, 2022, <https://open.spotify.com/episode/2OUxx8LrrURhijYbnWHbia>
- Podcast 150: R. Franke, *Faith is Not Magical Thinking*, Nov. 25, 2022, <https://open.spotify.com/episode/0R80MqKNeKnNZp5S7l0gYp>
- Podcast 148: R. Franke, *Stop Relaxing and Get Some Rest*, Nov. 25, 2022, <https://open.spotify.com/episode/2sQt2bBkIZq6lIYxLsVRGY>
- Podcast 146: R. Franke, *Divorce*, Nov. 25, 2022, <https://open.spotify.com/episode/0d2FHRIq7rixrFCrZFyc8t>
- Podcast 144: R. Franke, *Is Your Child A Consumer or Creator?*, Nov. 25, 2022, <https://open.spotify.com/episode/6HxugsM6errYgzUD2H6K5n>
- Podcast 142: R. Franke, *Principle of Marriage*, Nov. 25, 2022, <https://open.spotify.com/episode/5TBtABZWCD6FaIL3aXWoZ?si=STtHSbsfTxCoMRumwL3Wg>
- Podcast 140: R. Franke, *Raising Children in Truth in Any Neighborhood*, Nov. 25, 2022, <https://open.spotify.com/episode/36d3YGATUvZxK7DPrB1Qol>
- Podcast 138: R. Franke, *When Fathers Leave*, Nov. 25, 2022, <https://open.spotify.com/episode/2APR0b2oy2Cv5R8NX5ku4O>
- Podcast 136: R. Franke, *Privacy is Not a Principle*, Nov. 25, 2022, <https://open.spotify.com/episode/2QD9cNajyN17lq1MIX23BB>
- Podcast 134: R. Franke, *Standing Alone in Truth*, Nov. 25, 2022, <https://open.spotify.com/episode/3ypU115iITqDqHMGkFItE>

- Podcast 131: R. Franke, *Allowance is NOT a Principle*, <https://open.spotify.com/episode/2tj4W2VPC9dfOJhAilJupF>
- Podcast 130: R. Franke, *Truthful Touch*, Nov. 25, 2022, <https://open.spotify.com/episode/06Mpu7uJf0DsVN38BEM3jZ>
- Podcast 128, R. Franke, *Understanding Agency & My Body*, Nov. 25, 2022, <https://open.spotify.com/episode/7ugBBex60nG2Dm8RMr7haX>
- Podcast 126, R. Franke, *Rings of Responsibility*, Nov. 25, 2022, <https://open.spotify.com/episode/564WisS3Cse7k0mdtdTfNQ>
- Podcast 124: R. Franke, *Is Modesty a Principle of Truth?*, Nov. 25, 2022, <https://open.spotify.com/episode/5qHO8TMfx6rwMFGHhqpza>
- Podcast 122: R. Franke, *Santa DIDN'T Come*, Nov. 25, 2022, <https://open.spotify.com/episode/3E9NHKpOnbWKOIzq2xwUZy>

Savage

27. Instance 1: On July 27, 2016, when Plaintiff was in Canada, after Plaintiff tried to tell Savage he was mentally and emotionally healthy (contrary to hers and the Enterprise's false accusations and diagnoses), Savage emailed the following to Plaintiff from Utah,

I will hold you accountable for your behaviors to align with what you are saying. If you are where you say you are, you will be willing to come step into the Truth and stay there. If you can do that, you will begin and continue to meet my expectations very well. Partnered with God, I will be the judge of where you are.

The purpose of this act of wire fraud was to coerce Plaintiff to accept the Enterprise and Hildebrandt's "Truth", which would result in financial gain to Defendants. The consequence of this wire fraud was that it was more difficult for Plaintiff to leave the Enterprise.

28. Instance 2: On July 30, 2016, when Plaintiff was in Canada and Savage was in Utah, Savage emailed Plaintiff attempting to coerce him to conform to the Enterprise's principle of "boundaries." As fully set forth in the Complaint, the purpose and consequence of Savage's false representations concerning the Enterprise's objectives was to coerce Plaintiff to accept the Enterprise and Savage's abusive demands and induce Plaintiff to purchase fraudulent services and/or products through ConneXions for the financial benefit of the Enterprise. The result of this instance of wire fraud was that it was indeed more difficult for Plaintiff to leave the Enterprise.

29. Instances 3 and 4: Upon information and belief, on or about July 22, 2016, when Plaintiff was in Canada and Savage was in Utah, Savage accessed Plaintiff's email without his permission to surveil his behavior and found an email Plaintiff sent to a therapist seeking counseling services (as opposed to the counselor Savage unilaterally demanded the couple saw). Savage then sent Plaintiff an email message with the subject "We need to talk." She then sent a second email with the subject line "Immediately." The purpose of these two instances of wire fraud was to prevent Plaintiff from escaping the Enterprise. Enterprise members commonly sought to keep counseling relationships within the Enterprise for its financial gain and to exert control over its members. The consequence of these instances of federal wire fraud was that Plaintiff did not see a therapist outside of the Enterprise and accordingly, was victimized for a longer period of time by the Enterprise.

30. Instances 5 through 9: During Plaintiff's time in Canada between July 17, 2016 and July 31, 2016, Savage called Plaintiff from Utah at least five times. She angrily yelled at him and demanded that he conform to the Enterprise's objectives. The purpose of these instances of wire fraud was to coerce Plaintiff, through anger and threats, to stay within the Enterprise for the financial gain of the Enterprise. The result of these instances of wire fraud was that it was much more difficult for Plaintiff to leave the Enterprise because he feared for his emotional and physical safety given Savage's violent threats.

31. Instances 10 through 29: As set forth fully in the Complaint, Savage used interstate wires on at least twenty occasions between May and July 2016 to recruit Jessica Blanch to the Enterprise. The purpose of these instances of wire fraud was to induce Blanch to purchase fraudulent services and/or products through ConneXions for the financial benefit of the

Enterprise. The result of these instances of wire fraud was that Blanch did in fact join the Enterprise to its financial gain.

32. Instance 30: When Petitioner was in Canada in July 2016 and shortly after Blanch was criminally charged with domestic battery, Savage used interstate wires to call Plaintiff and attempt to convince him and Plaintiff's brother that Plaintiff's brother was the perpetrator rather than Blanch. This furthered the Enterprise by obscuring the fact that the Enterprise was a direct influence on Blanch's criminal assault. The purpose of this wire fraud was to also intimidate Plaintiff to remain in the Enterprise. The result of this instance was that Plaintiff feared for his safety, enabling Savage to keep him within the Enterprise's control.

33. Instance 31: As described in the Complaint, Savage engaged in another instance of federal wire fraud. In February 2017, Savage used interstate wires to defame Plaintiff's brother. This is in furtherance of the Enterprise; as a means to coerce victims to stay in the Enterprise, Enterprise members do everything in their power to destroy the lives of victims who leave. Savage engaged in this precise behavior in this wire fraud, resulting in Plaintiff and his family fearing for their safety, privacy and reputations as a result of Savage.

34. Instance 32: Savage engaged in another instance of federal wire fraud by using Instagram to further the objectives of the Enterprise. Around EJT's birthday in 2017, she used Instagram (i.e., interstate wires) to disparage Plaintiff on EJT's birthday by indicating to the internet that he is the source of darkness and pain in EJT's life. This use of interstate wires furthered the Enterprise by threatening victims with public, false disparagement if they leave the Enterprise.

35. Instance 33: On or around November 18, 2018, EJT called Plaintiff over interstate wires after she had sustained the severe injuries to her face described in the Complaint. At this

time, Savage was in Utah and Plaintiff was in Texas. On this call, Savage criminally instructed EJT to lie to Plaintiff about how EJT received her injuries. The purpose of this use of interstate wires by Savage was to hide the physical abuse Enterprise members inflict upon children. The consequence of this instance of wire fraud was that EJT, like Victim 2, refused to speak about her injuries with Plaintiff or authorities, thereby allowing Savage to avoid criminal prosecution for her child abuse and to further the objective of the Enterprise to perpetuate child abuse and torture.

36. Instance 34: On or around November 18, 2018, Savage used interstate wires over email to falsely communicate to Plaintiff that EJT's injuries (which Dr. Penman later reported to DCFS) were not serious and thereby deny EJT immediate medical care. At this time, Savage was in Utah and Plaintiff was in Texas. In this email, Savage refused to allow Plaintiff to seek the immediate medical attention EJT needed. The purpose of this act of wire fraud within the Enterprise was to hide the fact that the Enterprise engages in severe child abuse. The consequence of this wire fraud was that it was more difficult to medically treat EJT's injuries (thereby facilitating Savage not being prosecuted at the time) given Savage's delay in treatment.

37. Instance 35: On December 15, 2022, Savage used foreign wires from Utah to Brazil to stalk A. Tilleman and then disparage Plaintiff to A. Tilleman. This use of foreign wires furthered a key objective of the Enterprise: Enterprise members engage in defamation and tortious conduct against victims who leave the Enterprise as a means to discourage current or prospective Enterprise victims from leaving. The consequence is that, in line with Enterprise objectives, Plaintiff constantly fears for his safety and privacy.

38. Instance 36: Similarly, around this same time, Savage contacted employees of the dating application on which Plaintiff and his now-wife in order to disparage Plaintiff to

employees of the dating application in order to have their success story removed from the application's blog. Upon information and belief, this was accomplished over interstate wires (i.e., email or telephone). This furthered the essential element of the Enterprise of disparaging and/or defaming individuals who leave the Enterprise and destroying their lives.

39. Instances 37 through 332: As described in the Complaint, Savage and Washburn created secret email accounts for EJT and coerced her to message them during Plaintiff's parent-time regarding the Enterprise's affairs even after Hildebrandt had been arrested. These messages furthered the objectives of the Enterprise by coercing EJT to live the Enterprise's principles and depriving EJT of time with Plaintiff (as punishment for him not accepting the Enterprise). 296 of the above-referenced communications were made by Savage via interstate wires, including the following:

- July 7, 2023 (three messages when Savage was in Utah and EJT in Arizona);
- July 9, 2023 (thirty-one messages when Savage was in Utah and EJT was in Colorado in route to Canada);
- July 10, 2023 (two messages when Savage was in Utah and EJT was either in Colorado, Montana or Canada in route to Canada for her summer vacation with Plaintiff);
- July 11, 2023 (ninety-two messages when Savage was in Utah and EJT was in Canada);
- July 12, 2023 (seventeen messages when Savage was in Utah and EJT was in Canada);
- July 14, 2023 (thirteen messages when Savage was in Utah and EJT was in Canada);
- July 15, 2023 (five messages when Savage was in Utah and EJT was in Canada);
- July 16, 2023 (fifty-two messages when Savage was in Utah and EJT was in Canada);
- July 17, 2023 (one message when Savage was in Utah and EJT was in Canada);
- September 3, 2023 (one message when Savage was in Utah and EJT was in Arizona);
- December 21, 2023 (at least five messages when Savage was in Utah and EJT was in Arizona);
- December 22, 2023 (at least twenty-two messages when Savage was in Utah and EJT was in Arizona);
- December 23, 2023 (at least six messages when Savage was in Utah and EJT was in Arizona);
- December 24, 2024 (at least four messages when Savage was in Utah and EJT was in Arizona);
- December 25, 2024 (thirty-four messages when Savage was in Utah and EJT was in Arizona);
- December 26, 2024 (six messages when Savage was in Utah and EJT was in Arizona);

- December 27, 2024 (two messages when Savage was in Utah and EJT was in Arizona).

ConneXions

40. ConneXions similarly engaged in thousands of instances of federal wire fraud.

41. Because every instance of federal wire fraud by Hildebrandt and Franke was communicated through means controlled by or affiliated with ConneXions (i.e., the ConneXions social media accounts, ConneXions conferences, etc.), ConneXions is also a party to every instance of wire fraud committed by Hildebrandt and Franke.

42. This includes at least the following: the 732 instances of wire fraud by Hildebrandt via the ConneXions podcasts; the 244 instances of wire fraud by Franke via the ConneXions podcasts; the twenty-seven instances of wire fraud via the ConneXions couples panels; the fifteen instances of wire fraud via the ConneXions Masterclass; the instances of wire fraud committed at ConneXions conferences, including at least seven instances by Hildebrandt; and four by Franke; and the thousands of additional instances on ConneXions social media accounts including the ConneXions Instagram page, ConneXions Facebook page and the ConneXions YouTube channel.

43. Thus, ConneXions has engaged in at least 1,009 instances of wire fraud.